



<p>MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situating,</p> <p>Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p>Defendants.</p>	<p>Civil Action No. 04-CV-10307-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>PETER KALTMAN, Individually and On Behalf of All Others Similarly Situating,</p> <p>Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p>Defendants.</p>	<p>Civil Action No. 04-CV-10309-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situating,</p> <p>Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p>Defendants.</p>	<p>Civil Action No. 04-CV-10310-DPW</p> <p>Hon. Douglas P. Woodlock</p>

<p>RICHARD CURTIS, on Behalf of Himself and All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10314-MLW</p> <p>Hon. Mark L. Wolf</p>
<p>RONALD KASSOVER, on Behalf of Himself and All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10329-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>STEVE L. BAKER, Individually and on Behalf of All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10333-DPW</p> <p>Hon. Douglas P. Woodlock</p>

MICHAEL KAFFEE, on Behalf of Himself and All Others Similarly Situating,  Plaintiff,	:	Civil Action No. 04-CV-10345-DPW
v.	:	Hon. Douglas P. Woodlock
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
HAISING HU, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10346-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
CHARLES STARBUCK, Individually and on Behalf of All Others Similarly Situating,	:	Civil Action No. 04-CV-10362-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

<p>SAMUEL HO, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10363-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>JEFFREY C. RODRIGUES, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10364-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>ROBERT CONTE and MARK RESPLER, On Behalf of Themselves and all Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10382-DPW</p> <p>Hon. Douglas P. Woodlock</p>

<p>WHEATON ELECTRICAL SERVICES RETIREMENT 401K PROFIT SHARING, On Behalf of Itself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10383-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>BRIAN CLARK, On Behalf of Himself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10454-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>SHEILA BROWNWELL, On Behalf of Herself and All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 04-CV-10597-DPW</p> <p>Hon. Douglas P. Woodlock</p>
<p>SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly Situating,</p> <p style="text-align: center;">Plaintiff,</p>	<p>Civil Action No. 04-CV-10612-DPW</p> <p>Hon. Douglas P. Woodlock</p>

v.  SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,  Defendants.	: : : : : : : : : : :	
DAVID V. NOCITO, On Behalf of Himself and All Others Similarly Situated,  Plaintiff,  v.  SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,  Defendants.	: : : : : : : : : : :	Civil Action No. 04-CV-10623-DPW  Hon. Douglas P. Woodlock

The Court, having considered the papers filed in support of the motion of Plaintiff Saverio Pugliese ("Pugliese") to consolidate these actions, appoint him as Lead Plaintiff pursuant to § 21(D)(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act" also known as the "Private Securities Litigation Reform Act") and to appoint Lead Counsel and Liaison Counsel, and for good cause shown, hereby enters the following Order.

1. The following actions (the "Actions"), which allege similar factual and legal issues, are consolidated, pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, for all purposes, including discovery, pretrial proceedings, trial and appeal:

<u>Case Name</u>	<u>Case No.</u>
Deborah Chin, et al. v. Sonus Networks, Inc., et al.	04-CV-10294-DPW
Michelle Trebitsch, et al. v. Sonus Networks, Inc., et al.	04-CV-10307-DPW

Information Dynamics, LLC, et al. v. Sonus Networks, Inc., et al.	04-CV-10038-DPW
Peter Kaltman, et al. v. Sonus Networks, Inc., et al.	04-CV-10309-DPW
Samantha Den, et al. v. Sonus Networks, Inc., et al.	04-CV-10310-DPW
Richard Curtis, et al. v. Sonus Networks, Inc., et al.	04-CV-10314-MLW
Ronald Kassover, et al. v. Sonus Networks, Inc., et al.	04-CV-10329-DPW
Steve L. Baker, et al. v. Sonus Networks, Inc., et al.	04-CV-10333-DPW
Michael Kaffee, et al. v. Sonus Networks, Inc., et al.	04-CV-10345-DPW
Haiming Hu, et al. v. Sonus Networks, Inc., et al.	04-CV-10346-DPW
Charles Starbuck, et al. v. Sonus Networks, Inc., et al.	04-CV-10362-DPW
Samuel Ho, et al. v. Sonus Networks, Inc., et al.	04-CV-10363-DPW
Jeffrey C. Rodrigues, et al. v. Sonus Networks, Inc., et al.	04-CV-10364-DPW
Robert Conte, et al. v. Sonus Networks, Inc., et al.	04-CV-10382-DPW
Wheaton Electrical Services Retirement 401K Profit Sharing Plan, et al. v. Sonus Networks, Inc., et al.	04-CV-10383-DPW
Brian Clark, et al. v. Sonus Networks, Inc., et al.	04-CV-10454-DPW
Sheila Brownwell, et al. v. Sonus Networks, Inc., et al.	04-CV-10597-DPW
Saverio Pugliese, et al. v. Sonus Networks, Inc., et al.	04-CV-10612-DPW
David V. Nocito, et al. v. Sonus Networks, Inc., et al.	04-CV-10623-DPW

2. Master Docket and a Master File are hereby established for the consolidate Actions.

3. The consolidated actions shall be identified as *In re Sonus Networks, Inc.*, Civil Action No. 04-CV-10294-DPW, and the files of these consolidated actions shall be maintained in one file under Master File No. 04-CV-10294-DPW. Any other actions now pending or later filed in or transferred into this district that arise out of the same facts and claims alleged in the related actions shall be consolidated for all purposes, if and when they are brought to the Court's attention.



4. Every pleading filed in these consolidated actions, or in any separate action included herein, shall bear the following caption:

\_\_\_\_\_  
IN RE SONUS NETWORKS, INC. :  
SECURITIES LITIGATION :  
\_\_\_\_\_ :

CIVIL ACTION NO. 04-10294-DPW  
AND RELATED CASES

THIS DOCUMENT RELATES TO :  
\_\_\_\_\_ :

5. When a pleading is intended to be applicable to all actions governed by this Order, the words "All Actions" shall appear immediately after the words "This Document Relates to:" in the caption set out above. All pleadings that are applicable to "All Actions" shall be filed in the Master File and noted on the Master Docket. No further papers need be filed or docket entries made.

6. When a pleading is intended to be applicable only to some, but not all, of the consolidated actions, the Court's docket number for each individual action to which the pleading is intended to be applicable and the last name of the first-named plaintiff in the action shall appear immediately after the words "This Document Relates to:" in the caption described above, *e.g.*, 04-CV-10612-DPW (*Pugliese*).

7. When a pleading is filed and the caption shows that it is to be applicable to less than all of the consolidated actions, the clerk shall file the pleading in the Master File, and shall note the filing in both the Master Docket and the docket of each applicable action.

8. When a case related to the subject matter of the consolidated actions is filed in this Court or transferred to this Court from another court:

- a. The clerk of this Court shall place a copy of this Order in the separate file for such action, after notification to Plaintiffs' Liaison Counsel;
- b. Plaintiffs' Liaison Counsel shall mail to the attorneys for the plaintiffs in the newly-filed or transferred case a copy of this Order and direct that this Order be served upon or mailed to any new defendants in the newly filed or transferred case.
- c. The clerk of this Court shall make an appropriate entry on the Master Docket. This Court requests the assistance of counsel in calling the attention of the clerk of this Court to the filing or transfer of any case which may properly be consolidated as part of *In re Sonus Networks, Inc. Securities Litigation*.

9. Pugliese has also moved this Court for an order appointing him Lead Plaintiff in this class action, and to approve the law firm of Zwerling, Schachter & Zwerling, LLP (the "Zwerling Firm") as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo ("Berman DeValerio") as Liaison Counsel.

10. This Court, having considered the provisions of § 21D(a)(3)(B) of the Exchange Act, hereby determines that Pugliese is the "most adequate plaintiff" and that they satisfy the requirements of § 21D of the Exchange Act. The Court hereby appoints Pugliese as Lead Plaintiff to represent the interests of the putative class.

11. The Lead Plaintiff, pursuant to § 21D(a)(3)(B)(v) of the Exchange Act, has selected and retained the Zwerling Firm to be Lead Counsel. The Lead Plaintiff has also chosen Berman DeValerio to be Liaison Counsel. This Court approves those

selections, and hereby appoints the Zwerling Firm as Lead Counsel and Berman DeValerio as Liaison Counsel.

12. Lead Counsel shall have the following responsibilities and duties, to be carried out either personally or through counsel whom Lead Counsel shall designate:

- a. To coordinate and direct the briefing and argument of any and all motions;
- b. To coordinate and direct the conduct of any and all discovery proceedings;
- c. To coordinate and direct the examination of any and all witnesses in depositions;
- d. To coordinate and direct the selection of counsel to act as a spokesperson at all pre-trial conferences;
- e. To call meetings of the Plaintiff's counsel as the Zwerling Firm deems necessary and appropriate from time to time;
- f. To coordinate and direct all settlement negotiations with counsel for the Defendants;
- g. To coordinate and direct the preparation for trial and the trial of this matter and to delegate work responsibilities to selected counsel as may be required;
- h. To coordinate and direct the preparation and filings of all pleadings; and
- i. To coordinate and direct any other matters concerning the prosecution or resolution of this action.

13. No pleading, motion, request for discovery, or other pretrial proceedings shall be initiated or filed by any plaintiff without the approval of Lead Counsel, so as to prevent duplicative pleadings, motions or discovery. No settlement negotiations shall be conducted without the approval of Lead Counsel.

14. Lead Counsel shall be the contact between the Plaintiff's counsel and Defendants' counsel, as well as the spokesperson for all plaintiff's counsel.

15. Defendants shall effect service of papers on Plaintiffs by serving a copy of same on Lead Counsel and Liaison Counsel by overnight delivery service, facsimile, or hand delivery. Lead Plaintiff shall effect service of papers on Defendants by serving a copy of same on Defendants' counsel by overnight delivery service, facsimile or hand delivery.

IT IS SO ORDERED.

\_\_\_\_\_  
United States District Judge

DATED: \_\_\_\_\_, 2004